

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, New York 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.


BRUSSELS • FRANKFURT • LONDON • PARIS

BEIJING • HONG KONG • TOKYO

MELBOURNE • SYDNEY

REQUEST GRANTED as to Miguel Sarante and Jeffrey Guzman. The deadline for defendants to submit any motions is extended to June 1, 2021. Government is to respond by June 15, 2021. The hearing scheduled for May 10, 2021 will proceed as a Status Conference. Parties are directed to dial into the Court's teleconference line at 888-251-2909 and use access code 2123101.

3/29/2021 SO ORDERED.



LEWIS J. LIMAN
United States District Judge

March 26, 2021

Via ECF

The Honorable Lewis J. Liman,
United States District Court Judge,
Southern District of New York,
500 Pearl Street, Courtroom 15C,
New York, NY 10007-1312.

Re: United States v. Sarante, et al., No. 20-cr-00157 (S.D.N.Y.)

Dear Judge Liman:

I represent the defendant Miguel Sarante, and write to request an adjournment of the motion schedule in the above-captioned case, which currently requires the defendants to submit any motions by April 1, 2021, and the Government to respond by April 15, 2021. The Court has scheduled a motion hearing for May 10, 2021. In making this request, I have conferred with counsel for my client's co-defendant, Jeffrey Guzman, who joins in this request, and counsel for the Government, who consents and agrees to this request. I have copied Mr. Guzman's counsel and the Government on this letter.

The defendants continue to be engaged in respective discussions with the Government that may make motions unnecessary, but due to the ongoing pandemic—including quarantines at the Metropolitan Correctional Center and challenges for counsel in communicating fully and adequately with our clients concerning a potential pre-motion disposition of this matter—the parties are unable to complete those discussions at this time. I respectfully request a 60-day extension of the current motion deadlines while the parties continue to engage in, and hopefully complete, those discussions. This is the fourth request for an adjournment or extension.¹

¹ See May 15, 2020 Letter Motion from N. Friedlander (Dkt. No. 18); November 30, 2020 Letter Motion from N. Friedlander (Dkt. No. 32); January 27, 2021 Letter Motion from N. Friedlander (Dkt. No. 37).

The Honorable Lewis J. Liman

-2-

The parties also agree to an exclusion of time under the Speedy Trial Act during the pendency of these discussions.

Respectfully Submitted,
/s/ Nicole W. Friedlander
Nicole W. Friedlander

cc: AUSA Jason Swergold (via ECF)
Sabrina Shroff, Esq. (via ECF)